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PETTIT SQUARE PARTNERS, LLC  
3530 Kraft Road, Suite 204  
Naples, FL 34105

OFFICE OF GENERAL  
COUNSEL

Federal Election Commission  
Office of General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463

**Re: Complaint No. MUR 6463 – Supplemental Response from Pettit Square Partners, LLC**

Dear Mr. Jordan:

On July 29, 2011, Pettit Square Partners, LLC ("Pettit Square") received your correspondence attaching the second supplemental filing the FEC received from Iraj J. Zand and Raymond Schayek in the above referenced complaint (the "Second Supplemental Filing"). The Second Supplemental Filing detailed further suspected campaign finance violations by Jack Antaramian ("Mr. Antaramian") and Mona Antaramian ("Mrs. Antaramian") for contributions in excess of the 2008 biennial limit during the 2008 biennial period.

Pettit Square previously received your correspondence dated June 23, 2011 attaching the supplemental filing (the "Supplemental Filing") referencing the potential source of funds used for the campaign contributions and donations made by Mr. Antaramian.

Although Pettit Square has previously provided you with a response (the "Response") to the above referenced complaint on or about April 14, 2011, and has set forth with particularity the facts demonstrating that Pettit Square has not been involved in providing campaign finance contributions to the DNC or any other political campaign or party, nor has Pettit Square had any involvement in the source of funds issue addressed in the Supplemental Filing or the contributions in excess of the 2008 biennial limit during the 2008 biennial period addressed in the Second Supplemental Filing, Pettit Square appreciates the opportunity to continue to provide further information to the FEC in the FEC's ongoing investigation of potential illegal conduct by Mr. Antaramian in making campaign contributions to the DNC.

After further review of our records, there is one additional point that Pettit Square would like to reiterate and expound upon that may be of some additional use to the FEC in its review.

The Response already indicated that Mr. Antaramian was a manager and officer of Pettit Square until he was removed on January 25, 2011, through an action of the remaining members. See Exhibit "K" to the Response. Mr. Antaramian was a manager and officer while the time with Antaramian Development Corporation ("ADC") was in effect. In order for Pettit Square to bring an action to evict ADC and the DNC, the Operating Agreement for Pettit Square required that both managers of the company act "jointly" in the "bringing or defending (and all material decisions relating thereto) of law suits" in the name of the company. See Section 1(a) of the Operating Agreement previously attached as Exhibit "B" to the Response. Mr. Antaramian delayed providing any consent to bring the eviction action against ADC and the DNC.

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Furthermore, Mr. Antaramian's delaying tactics caused Pettit Square to incur extensive legal fees in relation to the lease and in removing ADC and the DNC from possession of the premises.

These fees and costs were magnified because Mr. Antaramian failed in his fiduciary obligations to Pettit Square in refusing to authorize legal action against ADC and the DNC. Pettit Square has now incurred in excess of \$200,000 in legal fees and costs in relation to the ADC lease, the DNC's wrongful occupation of the leased premises, and Mr. Antaramian's mismanagement.

Pettit Square continues to stand ready to provide information to the FEC in its ongoing investigation of campaign finance violations by Mr. Antaramian, and hope that the information provided in this Supplemental Response will prove helpful in your review.

Sincerely,

PETTIT SQUARE PARTNERS, LLC

By: [Signature]  
Kambiz Zand, Manager

STATE OF FLORIDA            )  
  ) SS:  
COUNTY OF COLLIER        )

SWORN to under oath and subscribed before me this 4 day of August, 2011, by Kambiz Zand. He is personally known to me.

SEAL



[Signature]  
Notary Public  
Lory C. Wright  
Printed Name  
EE068589      June 22, 2015  
Commission No.      Expiration Date